

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas
FILED

OCT 17 2019

United States of America

v.

Felipe Quiroz

Defendant

David J. Bradley, Clerk of Court

Case No.

H19-1940M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 06/23/2017 in the county of Harris in the Southern District of Texas, the defendant violated 8 U. S. C. § 1326(a), an offense described as follows:

a native and citizen of Colombia, and an alien who had been previously deported from the United States, was found unlawfully in the United States at Houston, Texas, the said defendant having not obtained the consent before March 2003 from the Attorney General of the United States to reapply for admission into the United States; and without having obtained corresponding consent after February 2003 from the Secretary of Homeland Security pursuant to 6 U.S.C. §§ 202(3) and (4) and 6 U.S.C. § 557,

This criminal complaint is based on these facts:

See attached Affidavit in support of the Criminal Complaint

☒ Continued on the attached sheet.

Complainant's signature

John P. Broderick, ICE Deportation Officer

Printed name and title

Sworn to me telephonically.

Date: 10/17/2019

*Judge's signature*City and state: Houston, Texas

Frances H. Stacy, Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, John P. Broderick, being duly sworn by telephone, hereby depose and say:

(1) I am a Deportation Officer with the United States Immigration and Customs Enforcement ("ICE") and have served in that capacity since April 1, 2007. Prior to this assignment, I was a Special Agent with ICE during the time period of March 1, 2003, through March 31, 2007. My law enforcement career began on October 26, 1992, as a Special Agent of the former Immigration and Naturalization Service and I had held this position until February 28, 2003. I currently have over 26 years of immigration law enforcement experience.

(2) On October 15, 2019, and at 02:04 pm, Felipe Quiroz ("Defendant") was detained by ICE. The Defendant is also known as, or has used the aliases of Jhon James Satizabal Rodriguez, Jonathan Bern Santana-Acevedo, and Jonathan Berna Santana-Acevedo.

(3) The Defendant's fingerprints have been taken and electronically submitted to various law enforcement databases. According to the Integrated Automated Fingerprint Identification System (IAFIS), the Defendant is the same individual as the person referred to in this Affidavit as having been previously deported and convicted.

(4) Based upon the information from ICE's records as described below, and my training and experience, I submit that there is probable cause to believe that the Defendant is in violation of 8 U.S.C. § 1326(a).

(5) Element One: The Defendant is a citizen and national of Colombia and not a native, citizen or national of the United States.

(6) Element Two: The Defendant has previously been deported or removed from the United States on the following occasion(s):

a. July 25, 2015, via New Orleans, Louisiana

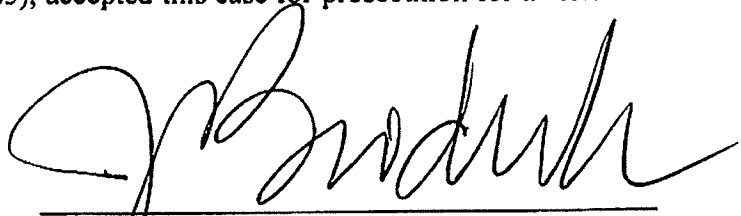
(7) Element Three: After deportation, the Defendant was subsequently found in the United States on June 23, 2017, in Houston, Texas, which is within the Southern District of Texas. Additionally, I consulted with ICE's Person Centric Query System (PCQS) to determine whether, in the past five years and / or after the Defendant's last deportation, the Defendant had been encountered by law enforcement prior to the date specified earlier in this paragraph. The PCQS revealed that it had received an interoperability query on June 23, 2017, between the DOJ FBI and DHS ICE's US VISIT database after Defendant's last known deportation.

(8) Element Four: The Defendant did not have permission to reenter the United States. On October 16, 2019, I reviewed the contents of the Alien File associated with this Defendant and/or available database information. I found no indication that the Defendant has ever received permission from the Attorney General of the United States, or the Secretary of the Department of Homeland Security, to apply for admission to the United States following deportation from the United States. I have requested certification of this fact from the Records Branch of the Immigration Service.

(9) Prior Criminal History / Gang Affiliation. The Defendant has the following prior criminal history and/or gang affiliation:

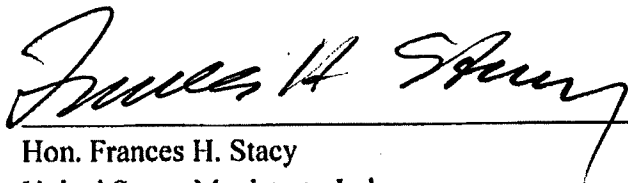
- a. On November 4, 2011, Defendant received a sentence of 2 years of confinement as a result of his conviction for the offense of Possession of a Controlled Substance; to wit: 4 – 200 grams of Cocaine, in the 184th District Court of Harris County, Texas, under Case # 130832501010.

(10) On October 16, 2019, I contacted the U.S. Attorney's Office, Southern District of Texas, Houston Division, concerning this criminal complaint. On or about that day, Assistant U.S. Attorney Matthew Boyden, (713-208-5885), accepted this case for prosecution for a violation of 8 U.S.C. § 1326(a).



John P. Broderick, Deportation Officer
United States Department of Homeland Security
U.S. Immigration & Customs Enforcement

Signed and sworn telephonically before me on this 17th day of October, 2019, and I find probable cause.



Hon. Frances H. Stacy
United States Magistrate Judge
Southern District of Texas

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States of America

v.

Felipe Quiroz

Defendant

Case No.

H19-1940M

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Felipe Quiroz,
who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Illegal re-entry into the United States after having previously been deported to Colombia, without first applying for and obtaining permission from the Attorney General of the United States, or the Secretary for the Department of Homeland Security, for admission to the United States following deportation from the United States, in violation of Title 8, United States Code, Section 1326(a).

Date: 10/17/2019

 Issuing officer's signature
City and state: Houston, Texas
Frances H. Stacy, Magistrate Judge
 Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

 Arresting officer's signature

 Printed name and title